

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,

Plaintiff,

VS.

Case No. 2:22-CV-203-JRG

MICRON TECHNOLOGY, INC.,
MICRON SEMICONDUCTOR
PRODUCTS, INC., AND MICRON
TECHNOLOGY TEXAS LLC,

JURY TRIAL DEMANDED

MICRON TECHNOLOGY, INC.,
MICRON SEMICONDUCTOR
PRODUCTS, INC., AND MICRON
TECHNOLOGY TEXAS LLC,

MICRON SEMICONDUCTOR
PRODUCTS, INC., AND MICRON
TECHNOLOGY TEXAS LLC,

PRODUCTS, INC., AND MICRON
TECHNOLOGY TEXAS LLC,

TECHNOLOGY TEXAS LLC,

Defendants.

Defendants.

Defendants.

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF PLAINTIFF
NETLIST, INC.'S MOTION TO STRIKE CERTAIN OPINIONS OF
DEFENDANTS' EXPERT DR. HAROLD STONE**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Plaintiff Netlist, Inc.’s Motion to Strike Certain Opinions of Defendants’ Expert Dr. Harold Stone. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is true and correct copy of copy of the Expert Report of Dr. Harold Stone Regarding Invalidity & Other Issues Related to Plaintiff’s U.S. Patent Nos. 10,860,506; 10,949,339; 11,016,918; and 11,232,054, dated October 4, 2023.

3. Attached as **Exhibit 2** is a true and correct copy of the Expert Report of Dr. Harold Stone Regarding Non-Infringement & Other Issues Related to Plaintiff’s U.S. Patent Nos. 11,016,918 and 11,232,054, dated October 30, 2023

4. Attached as **Exhibit 3** is true and correct excerpted copy of the JEDEC Standard, JESD301-1, dated June 2020.

5. Attached as **Exhibit 4** is true and correct excerpted copy of the JEDEC Standard, JESD301-2, dated October 2022.

6. Attached as **Exhibit 5** is true and correct excerpted copy of the JEDEC Manual, JM21U, dated December 2022.

7. Attached as **Exhibit 6** is true and correct excerpted copy of the deposition transcript of Frank Ross, dated August 17, 2023.

8. Attached as **Exhibit 7** is true and correct excerpted copy of the deposition transcript of Katherine Hoang, dated August 10, 2023.

9. Attached as **Exhibit 8** is true and correct excerpted copy of the deposition

transcript of Terry Lo, dated September 1, 2023.

10. Attached as **Exhibit 9** is true and correct excerpted copy of the Expert Report of Dr. William Henry Mangione-Smith, dated February 14, 2023.

11. Attached as **Exhibit 10** is true and correct excerpted copy of the Expert Report of Dr. William Henry Mangione-Smith, dated February 14, 2023.

12. Attached as **Exhibit 11** is true and correct excerpted copy of the deposition transcript of Boe Holbrook, dated August 30, 2023.

13. Attached as **Exhibit 12** is true and correct copy of email correspondence from R. Park to Y. Zhao, dated August 25, 2023.

14. Attached as **Exhibit 13** is true and correct copy of Netlist, Inc.'s First Notice of Deposition of Defendants Micron Technology, Inc., et al., dated May 15, 2023.

15. Attached as **Exhibit 14** is true and correct excerpted copy of the deposition transcript of John B. Halbert, dated September 30, 2023.

16. Attached as **Exhibit 15** is true and correct copy of Netlist, Inc.'s Disclosure of Asserted Claims and Infringement Contentions, dated September 8, 2022.

17. Attached as **Exhibit 16** is true and correct copy of Netlist, Inc.'s First Set of Interrogatories to Defendants (Nos. 1-23), dated January 11, 2023.

18. Attached as **Exhibit 17** is true and correct copy of Defendants' Sixth Supplemental Responses and Objections to Plaintiff Netlist, Inc.'s First Set of Interrogatories, dated September 20, 2023.

19. Attached as **Exhibit 18** is true and correct copy of the Claim Construction Order (Dkt. 114) from *Netlist v. Samsung*, Case No. 2:21-cv-463-JRG, dated December 14, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 14, 2023, in Los Angeles, California.

By */s/ Jason G. Sheasby*

Jason G. Sheasby